

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

SOUTHERN CALIFORNIA PUBLIC
POWER AUTHORITY, *et al.*,

Plaintiffs,

V.

ULTRA RESOURCES, INC.

Defendants/Counter-Claimant,

V.

SOUTHERN CALIFORNIA PUBLIC
POWER AUTHORITY, *et al.*,

Counter-Defendants.

VANGUARD NATURAL RESOURCES,
LLC, *et al.*,

Debtors,

V.

ULTRA RESOURCES, INC.

Claimant.

**PINEDALE ENERGY, INC. AND STANDARD ENERGY CORP.'S
RESPONSE TO ORIGINAL PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

Counter-Defendants Pinedale Energy, Inc. (“Pinedale”) and Standard Energy Corp. (“Standard”) file this *Response* (“Response”) to *Original Plaintiffs’ Motion for Summary Judgment* [Dkt. No. 33] filed by Southern California Public Power Authority and Turlock Irrigation District (“SCPPA/Turlock Motion”), and respectfully show the Court as follows:

1. Pinedale and Standard join and incorporate the facts and arguments from *Ultra Resources, Inc. 's Motion for Partial Summary Judgment* [Dkt. No. 44] (“Ultra's Motion”), insofar as Section II, entitled “‘*Collateral Estoppel*’ *Does Not Oblige the Court to Endorse a Clearly*

Erroneous Interpretation of the SAA,” (located within ¶¶ 50-93, on pgs. 20-40) into this Response as though set forth in full.

2. Pinedale and Standard also incorporate the facts and arguments from *Pinedale Energy, Inc. and Standard Energy Corp.’s Motion for Partial Summary Judgment Pertaining to the Interpretation of the Supplemental Accounting Agreement* [Dkt. No. 38] into this Response as though set forth in full.

3. Pinedale and Standard also incorporate the arguments from *Ultra Resources, Inc.’s Consolidated Response to Plaintiff/Counter-Defendants’ Motion for Summary Judgment* [Dkt. No. 45] into this Response as though set forth in full.

Dated: July 26, 2019.

Respectfully submitted,

McGINNIS LOCHRIDGE LLP

/s/ Christopher L. Halgren

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**ATTORNEYS FOR
PINEDALE AND STANDARD**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this Friday, July 26, 2019, the foregoing was filed with the Court and served via the Court's CM/ECF system to all of the parties registered to receive such notice.

/s/ Christopher L. Halgren

Christopher L. Halgren